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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

United States of America,

Plaintiff,

vs.

Sergei Zakirov,

Defendant.

No. CR-24-00426-01-PHX-GMS

**MOTION TO CONTINUE TRIAL
and MOTION TO EXTEND
PRETRIAL MOTION DEADLINE**

(First Request)

(Defendant In Custody)

Defendant Sergei Zakirov, through undersigned counsel, respectfully requests that this Court extend the time for filing of pretrial motions for a period of at least sixty (60) days from the current date of April 10, 2024. In addition, defendant requests that the Court continue the trial date for a period of at least sixty (60) days from the current date of May 7, 2024.

The additional time is necessary to allow defense counsel to finish the review of discovery, investigate the case, prepare for trial, and render the effective assistance of counsel to the defendant.

...

1 Mr. Sergei Zakirov further requests that any subpoenas previously issued
2 and served in this matter remain in effect and the party who served the subpoena
3 should advise the witnesses of the new trial date.

4 Defense counsel has contacted Assistant United States Attorney Ross
5 Gabriel Arellano Edwards of the contents of this motion and the government has
6 no objection to the requested continuances.

7 Excludable delay under 18 U.S.C. § 3161(h)(7)(B)(i) and (iv) may result
8 from this motion or from an order based thereon.

9 Respectfully submitted: March 29, 2024.

10 JON M. SANDS
11 Federal Public Defender

12
13 s/George J. Romero
14 GEORGE J. ROMERO
Asst. Federal Public Defender

15 Copy of the foregoing transmitted
16 by ECF for filing March 29, 2024, to:

17
18 CLERK'S OFFICE
19 United States District Court

20 Ross Gabriel Arellano Edwards
21 Assistant U.S. Attorney

22 Copy mailed to:

23 Defendant

24
25 L. Aguilera
26 L. Aguilera